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6
7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE DISTRICT OF OREGON
9 AT PORTLAND

10 CITY OF PORTLAND, a municipal corporation,))
11 v.) Plaintiff,)) No. _____
12 UBER TECHNOLOGIES, INC., a Delaware)) DECLARATION OF BROOKE
13 corporation,)) STEGER IN SUPPORT OF
14) Defendant.)) DEFENDANTS' NOTICE OF
15)) REMOVAL

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17 1. I am the General Manager of Uber Technologies, Inc., overseeing the Pacific
18 Northwest and I have personal knowledge of the facts stated herein.

19 2. If Uber is prohibited from operating its business in the City of Portland, Uber
20 would suffer significant lost profits. I am familiar with Uber's business and profits generally in
21 Seattle, WA, Vancouver, WA, and in the communities surrounding Portland. Based on my
22 experience in those cities and given the demand for Uber's services by Portland residents,
23 interested drivers, and local businesses, the lost profits to Uber as a result of an injunction
24 prohibiting Uber's business in Portland would certainly exceed \$100,000.

25 3. If Uber were required to obtain licenses and permits and change its business so that it
26 operated as if it were a Taxicab Company or a Limited Passenger Transportation Company in

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1 DECLARATION IN SUPPORT OF NOTICE OF REMOVAL
2 (No. _____) — 1
3 DWT 25491296v2 0096932-000015

Davis Wright Tremaine LLP

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1 Portland, as described in and regulated by the Portland City Code, that would cost in excess of
2 \$100,000.

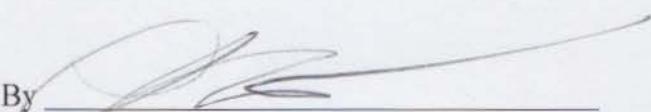
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4 I declare that the foregoing is true and correct to the best of my knowledge under
5 penalty of perjury under the laws of the states of Washington and Oregon.

6

7 Executed at PORTLAND, OR this 7 day of December, 2014.

8

9 By 
10 BROOKE STEGER